

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

4/12/04 12 P.M. 24

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and On Behalf of All Others Similarly Situated,) Civil Action No. 04-CV-10294-DPW

Plaintiff,) CLASS ACTION

vs.)

SONUS NETWORKS, INC., et al.,)

Defendants.)

MICHELLE TREBITSCH, On Behalf of Herself and All Others Similarly Situated,) Civil Action No. 04-CV-10307-DPW

Plaintiff,) CLASS ACTION

vs.)

SONUS NETWORKS, INC., et al.,)

Defendants.)

[Caption continued on following page.]

[PROPOSED] ORDER GRANTING GLOBAL UNDervalued SECURITIES MASTER FUND'S MOTION TO CONSOLIDATE CASES FOR ALL PURPOSES AND REQUIRING PRESERVATION OF DOCUMENTS

INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated,)	Civil Action No. 04-CV-10308-DPW
)	<u>CLASS ACTION</u>
)	
Plaintiff,)	
)	
vs.)	
)	
SONUS NETWORKS, INC., et al.,)	
)	
Defendants.)	
)	
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PETER KALTMAN, On Behalf of Himself and All Others Similarly Situated,)	Civil Action No. 04-CV-10309-DPW
)	<u>CLASS ACTION</u>
)	
Plaintiff,)	
)	
vs.)	
)	
SONUS NETWORKS, INC., et al.,)	
)	
Defendants.)	
)	
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SAMANTHA DEN, Individually and On Behalf of All Others Similarly Situated,)	Civil Action No. 04-CV-10310-DPW
)	<u>CLASS ACTION</u>
)	
Plaintiff,)	
)	
vs.)	
)	
SONUS NETWORKS, INC., et al.,)	
)	
Defendants.)	
)	

[Caption continued on following page.]

RICHARD CURTIS, Individually and On Behalf of All Others Similarly Situated,)	Civil Action No. 04-CV-10314-MLW
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	
SONUS NETWORKS, INC., et al.,)	
Defendants.)	
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RONALD KASSOVER, On Behalf of the Ronald Kassover IRA and All Others Similarly Situated,)	Civil Action No. 04-CV-10329-DPW
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	
SONUS NETWORKS, INC., et al.,)	
Defendants.)	
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STEVE L. BAKER, Individually and On Behalf of All Others Similarly Situated,)	Civil Action No. 04-CV-10333-DPW
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	
SONUS NETWORKS, INC., et al.,)	
Defendants.)	
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MICHAEL KAFFEE, Individually and On Behalf of All Others Similarly Situated,) Civil Action No. 04-CV-10345-DPW
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)
HAIMING HU, Individually and On Behalf of All Others Similarly Situated,) Civil Action No. 04-CV-10346-DPW
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)
CHARLES STARBUCK, Individually and On Behalf of All Others Similarly Situated,) Civil Action No. 04-CV-10362-DPW
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

[Caption continued on following page.]

SAMUEL HO, Individually and On Behalf of) Civil Action No. 04-CV-10363-DPW
All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

JEFFREY C. RODRIGUES, Individually and) Civil Action No. 04-CV-10364-DPW
On Behalf of All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

ROBERT CONTE and MARK RESPLER,) Civil Action No. 04-CV-10382-DPW
Themselves and On Behalf of All Others)
Similarly Situated,) CLASS ACTION
Plaintiffs,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

[Caption continued on following page.]

WHEATON ELECTRICAL SERVICES) Civil Action No. 04-CV-10383-DPW
RETIREMENT 401K PROFIT SHARING)
PLAN, On Behalf of Itself and All Others)
Similarly Situated,)
Plaintiff,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)
BRIAN CLARK, Individually and On Behalf) Civil Action No. 04-CV-10454-DPW
of All Others Similarly Situated,)
Plaintiff,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)
SHEILA BROWNELL, Individually and On) Civil Action No. 04-CV-10597-DPW
Behalf of All Others Similarly Situated,)
Plaintiff,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

[Caption continued on following page.]

SAVERIO PUGLIESE, On Behalf of Himself) Civil Action No. 04-CV-10612-DPW
and All Others Similarly Situated,)
Plaintiff,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)
DAVID V. NOCITO, On Behalf of Himself) Civil Action No. 04-CV-10623-DPW
and All Others Similarly Situated,)
Plaintiff,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)
-----)

Having considered Global Undervalued Securities Master Fund's motion to consolidate the actions listed below and good cause appearing therefore, IT IS HEREBY ORDERED that:

1. The Motion to Consolidate Cases for All Purposes is GRANTED;
2. The following actions are hereby consolidated for all purposes, including pretrial proceedings, trial and appeal, pursuant to Rule 42(a) of the Federal Rules of Civil Procedure:

Abbreviated Case Name	Case Number	Date Filed
Chin v. Sonus Networks, Inc., et al.	04-CV-10294-DPW	February 12, 2004
Trebitsch v. Sonus Networks, Inc., et al.	04-CV-10307-DPW	February 13, 2004
Information Dynamics, LLC v. Sonus Networks, Inc., et al.	04-CV-10308-DPW	February 13, 2004
Kaltman v. Sonus Networks, Inc., et al.	04-CV-10309-DPW	February 13, 2004
Den v. Sonus Networks, Inc., et al.	04-CV-10310-DPW	February 13, 2004
Curtis v. Sonus Networks, Inc., et al.	04-CV-10314-MLW	February 13, 2004
Kassover v. Sonus Networks, Inc., et al.	04-CV-10329-DPW	February 17, 2004
Baker v. Sonus Networks, Inc., et al.	04-CV-10333-DPW	February 18, 2004
Kaffee v. Sonus Networks, Inc., et al.	04-CV-10345-DPW	February 20, 2004
Hu v. Sonus Networks, Inc., et al.	04-CV-10346-DPW	February 20, 2004
Starbuck v. Sonus Networks, Inc., et al.	04-CV-10362-DPW	February 23, 2004
Ho v. Sonus Networks, Inc., et al.	04-CV-10363-DPW	February 23, 2004
Rodrigues v. Sonus Networks, Inc., et al.	04-CV-10364-DPW	February 23, 2004
Conte, et al. v. Sonus Networks, Inc., et al.	04-CV-10382-DPW	February 26, 2004
Wheaton Electrical Servs. Ret. 401K Profit Sharing Plan v. Sonus Networks, Inc., et al.	04-CV-10383-DPW	February 26, 2004
Clark v. Sonus Networks, Inc., et al	04-CV-10454-DPW	March 3, 2004
Brownell v. Sonus Networks, Inc., et al.	04-CV-10597-DPW	March 31, 2004
Pugliese v. Sonus Networks, Inc., et al.	04-CV-10612-DPW	March 30, 2004
Nocito v. Sonus Networks, Inc., et al.	04-CV-10623-DPW	March 31, 2004

3. The caption of these consolidated actions shall be "In re Sonus Networks, Inc. Securities Litigation," and the files of these consolidated actions shall be maintained in one file under Master File No. 04-10294-DPW. Any other actions now pending or later filed or transferred into this District that arise out of or are related to the same facts as alleged in the above-identified cases shall be consolidated for all purposes if and when they are brought to the Court's attention.

4. Every pleading filed in the consolidated actions, or in any separate action included herein, shall bear the following caption:

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re SONUS NETWORKS, INC.)	Master File No. 04-CV-10294-DPW
SECURITIES LITIGATION)	
<hr/>		
This Document Relates to:)	
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5. When a pleading is intended to be applicable to all actions governed by this Order, the words "All Actions" shall appear immediately after the words "This Document Relates To:" in the caption set out above. When a pleading is intended to be applicable to some, but not all, of the consolidated actions, this Court's docket number for each individual action to which the pleading is intended to apply and the last name of the first-named plaintiff in said action shall appear immediately after the words "This Document Relates To:" in the caption set out above (e.g., "04-CV-10294-DPW").

6. A Master Docket and a Master File are hereby established for the above consolidated proceedings and for all other related cases filed in or transferred to this Court. Separate dockets shall continue to be maintained for each of the individual actions hereby consolidated, and entries shall be

made in the docket of each individual case in accordance with the regular procedures of the clerk of this Court, except as modified by this Order.

7. When a pleading is filed and the caption shows that it is applicable to "All Actions," the clerk shall file such pleading in the Master File and note such filing on the Master Docket. No further copies need be filed, and no other docket entries need be made.

8. When a pleading is filed and the caption shows that it is to apply to fewer than all of the consolidated actions, the clerk will file such pleading in the Master File only, but shall docket such filing on the Master Docket and the docket of each applicable action.

9. When a case that properly belongs as a part of "In re Sonus Networks, Inc. Securities Litigation" is filed in this Court or transferred to this Court from another court and assigned to Judge Woodlock, the clerk of this Court shall:

- (a) Place a copy of this Order in the separate file for such action;
- (b) Mail to the attorneys for the plaintiffs in the newly filed or transferred case a copy of this Order and direct that this Order be served upon or mailed to any new defendant(s) or their counsel in the newly filed or transferred case; and
- (c) Make an appropriate entry on the Master Docket. This Court requests the assistance of counsel in calling to the attention of the clerk of this Court the filing or transfer of any case that properly might be consolidated as part of "In re Sonus Networks, Inc. Securities Litigation."

10. After the Court has designated a lead plaintiff pursuant to 15 U.S.C. §78u-4(a)(3)(B), the lead plaintiff shall designate a law firm or firms to serve as lead plaintiff's counsel, pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v). Lead plaintiff's counsel shall have authority to speak for and enter into agreements on behalf of plaintiffs in all matters regarding pretrial procedures, discovery and

settlement negotiations. Lead plaintiff's counsel shall manage the prosecution of this litigation to avoid duplicative or unproductive activities. Lead plaintiff's counsel shall be responsible for coordination of all activities and appearances on behalf of plaintiffs and for dissemination of notices and orders. Lead plaintiff's counsel shall be responsible for communications with the Court.

11. Defendants' counsel may rely upon agreements made with lead plaintiff's counsel. Such agreements shall be binding on all plaintiffs.

12. Counsel for the parties shall notify their clients of their document preservation obligations pursuant to the federal securities laws.

13. Pursuant to 15 U.S.C. §78u-4(b)(3)(C), the parties shall "treat all documents, data compilations (including electronically recorded or stored data), and tangible objects that are in the custody or control of such person and that are relevant to the allegations, as if they were the subject of a continuing request for production of documents from an opposing party under the Federal Rules of Civil Procedure." The term "document" shall be interpreted consistently with the terms "document" and "writing" as used in the Federal Rules of Civil Procedure and Federal Rules of Evidence.

14. Defendants are not required to respond to the complaint in any action consolidated into this action, other than a consolidated complaint or a complaint designated as the operative complaint.

15. Lead plaintiff shall file a consolidated complaint within 60 days after the filing of the Order designating the lead plaintiff, unless otherwise agreed upon by the parties. The consolidated complaint shall be the operative complaint and shall supersede all complaints filed in any of the actions consolidated herein.

16. Defendants shall respond to the consolidated complaint within 45 days after service. If defendants file any motions directed at the consolidated complaint, the opposition brief shall be filed within 45 days of filing that motion and the reply brief shall be filed within 21 days of the filing of the opposition brief, unless otherwise agreed upon by the parties.

IT IS SO ORDERED.

HONORABLE DOUGLAS P. WOODLOCK
UNITED STATES DISTRICT COURT JUDGE

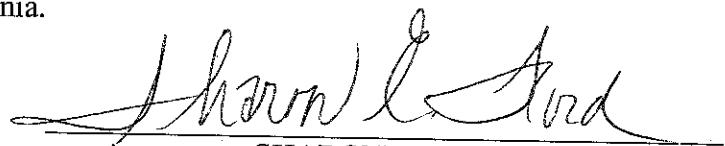
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DECLARATION OF SERVICE BY MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is 401 B Street, Suite 1700, San Diego, California 92101.
2. That on April 12, 2004, declarant served the [PROPOSED] ORDER GRANTING GLOBAL UNDervalued SECURITIES MASTER FUND'S MOTION TO CONSOLIDATE CASES FOR ALL PURPOSES AND REQUIRING PRESERVATION OF DOCUMENTS by depositing a true copy thereof in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.
3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of April, 2004, at San Diego, California.



SHARON E. FORD

SONUS NETWORKS-CA

Service List - 4/6/2004 (04-0069)

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Counsel For Defendant(s)

John R. Baraniak, Jr.
 Robert S. Frank, Jr.
 Choate, Hall & Stewart
 53 State Street, Exchange Place
 Boston, MA 02109-2891
 617/248-5000
 617/248-4000(Fax)

James W. Prendergast
 Jeffrey B. Rudman
 Daniel W. Halston
 Hale And Dorr
 60 State Street
 Boston, MA 02109
 617/526-6000
 617/526-5000(Fax)

Thomas J. Dougherty
 Matthew J. Matule
 Skadden, Arps, Slate, Meagher & Flom LLP
 One Beacon Street
 Boston, MA 02108
 617/573-4800
 617/573-4822(Fax)

Counsel For Plaintiff(s)

Jeffrey C. Block
 Michael T. Matraia
 Shannon L. Hopkins
 Berman DeValerio Pease Tabacco Burt & Pucillo
 One Liberty Square
 Boston, MA 02109
 617/542-8300
 617/542-1194(Fax)

Evan J. Smith
 Brodsky & Smith, LLC
 333 E. City Avenue, Suite 602
 Bala Cynwyd, PA 19004
 610/667-6200
 610/667-9029(Fax)

Samuel H. Rudman
 David A. Rosenfeld
 Mario Alba, Jr.
 Cauley Geller Bowman & Rudman, LLP
 200 Broadhollow Road, Suite 406
 Melville, NY 11747
 631/367-7100
 631/367-1173(Fax)

Steven J. Toll
 Daniel S. Sommers
 Julie Goldsmith
 Cohen, Milstein, Hausfeld & Toll, P.L.L.C.
 1100 New York Ave., N.W., Suite 500
 Washington, DC 20005-3964
 202/408-4600
 202/408-4699(Fax)

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Jonathan M. Plasse
Goodkind Labaton Rudoff & Sucharow, LLP
100 Park Avenue, 12th Floor
New York, NY 10017-5563
212/907-0700
212/818-0477(Fax)

Brian M. Felgoise
Law Offices of Brian M. Felgoise
261 Old York Road, Suite 423
Jenkintown, PA 19046
215/886-1900

Bruce G. Murphy
Law Offices of Bruce G. Murphy
265 Llwyds Lane
Vero Beach, FL 32963
772/231-4202
772/234-0440(Fax)

Charles J. Piven
Law Offices of Charles J. Piven, P.A.
The World Trade Center
401 East Pratt Street, Suite 2525
Baltimore, MD 21202
410/332-0030
410/685-1300(Fax)

Marc S. Henzel
Law Offices of Marc S. Henzel
273 Montgomery Avenue, Suite 202
Bala Cynwyd, PA 19004
610/660-8000
610/660-8080(Fax)

Richard J. Vita
Law Offices of Richard J. Vita
77 Franklin Street, Suite 300
Boston, MA 02110
617/426-6566
617/357-1612(Fax)

Richard A. Lockridge
Karen H. Riebel
Lockridge Grindal Nauen, P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
612/339-6900
612/339-0981(Fax)

Steven G. Schulman
Richard H. Weiss
Peter E. Seidman
Milberg Weiss Bershad Hynes & Lerach LLP
One Pennsylvania Plaza
New York, NY 10119
212/594-5300
212/868-1229(Fax)

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William S. Lerach
 Travis E. Downs III
 Thomas E Glynn
 Milberg Weiss Bershad Hynes & Lerach LLP
 401 B Street, Suite 1700
 San Diego, CA 92101-4297
 619/231-1058
 619/231-7423(Fax)

Nancy Freeman Gans
 Moulton & Gans, P.C.
 33 Broad Street, Suite 1100
 Boston, MA 02109
 617/369-7979
 617/369-7980(Fax)

Eric J. Belfi
 Murray Frank & Sailer, LLP
 275 Madison Avenue, Suite 801
 New York, NY 10016
 212/682-1818
 212/682-1892(Fax)

Laurence D. Paskowitz
 Paskowitz & Associates
 271 Madison Avenue, 20th Floor
 New York, NY 10016
 212/685-0969
 212/685-2306(Fax)

Marc I. Gross
 Joseph Gentile
 Pomerantz Haudek Block Grossman & Gross
 LLP
 100 Park Avenue, 26th Floor
 New York, NY 10017-5516
 212/661-1100
 212/661-8665(Fax)

M. Clay Ragsdale IV
 Ragsdale & Frese LLC
 1929 Third Avenue North
 550 Farley Building
 Birmingham, AL 35253-0924
 205/251-4775
 205/251-4777(Fax)

Roy L. Jacobs
 Roy L. Jacobs Attorney At Law
 60 East 42nd Street, 46th Floor
 New York, NY 10165
 212/867-1156
 212/504-8343(Fax)

Andrew M. Schatz
 Jeffrey S. Nobel
 Nancy A. Kulesa
 Schatz & Nobel, P.C.
 One Corporate Center
 20 Church Street, Suite 1700
 Hartford, CT 06103
 860/493-6292
 860/493-6290(Fax)

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Marc A. Topaz
Schiffelin & Waide, LLP
Three Bala Plaza East, Suite 400
Bala Cynwyd, PA 19004
610/667-7706
610/667-7056(Fax)

Samuel P. Sporn
Christopher Lometti
Frank R. Schirripa
Schoengold & Sporn, P.C.
19 Fulton Street, Suite 406
New York, NY 10038
212/964-0046
212/267-8137(Fax)

Ralph M. Stone
Shalov Stone & Bonner LLP
485 Seventh Avenue, Suite 1000
New York, NY 10018
212/239-4340
212/239-4310(Fax)

Thomas G. Shapiro
Theodore M. Hess-Mahan
Shapiro Haber & Urmy, LLP
75 State Street
Boston, MA 02109
617/439-3939
617/439-0134(Fax)

Jules Brody
Stull, Stull & Brody
6 East 45th Street, 4th Floor
New York, NY 10017
212/687-7230
212/490-2022(Fax)

Robert I. Harwood
Samuel K. Rosen
Wechsler Harwood LLP
488 Madison Avenue, 8th Floor
New York, NY 10022
212/935-7400
212/753-3630(Fax)

Joseph H. Weiss
Jack I. Zwick
Weiss & Yourman
551 Fifth Avenue, Suite 1600
New York, NY 10176
212/682-3025
212/682-3010(Fax)

Marian P. Rosner
Michael A. Schwartz
Renee L. Karalian
Wolf Popper LLP
845 Third Avenue
New York, NY 10022
212/759-4600
212/486-2093(Fax)

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Eduard Korsinsky

Zimmerman, Levi & Korsinsky, LLP
39 Broadway, Suite 1440
New York, NY 10006
212/363-7500
212/363-7171 (Fax)

Richard A. Speirs

Shaye Fuchs

Zwerling, Schachter & Zwerling, LLP
767 Third Avenue
New York, NY 10017-2023
212/223-3900
212/371-5969 (Fax)